

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 49 & 139

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, proposed counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 19, 2022, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and Claims of Worthless Stock Deductions and (II) Granting Certain Related Relief* [D.I. 49] (the “Motion”).

2. On November 22, 2022, the Court entered the *Interim Order (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and Claims of Worthless Stock Deductions and (II) Granting Certain Related Relief* [D.I. 139].

3. As of the date hereof, no formal objection or other responses to the Motion have been filed or served on the Debtors. The Debtors received informal comments (the “Informal Comments”) to the proposed form of order filed with the Motion from the United States Trustee

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

(the “U.S. Trustee”), the Official Committee of Unsecured Creditors (the “Committee”) and the Securities and Exchange Commission (the “SEC”).

4. To resolve the Informal Comments, the Debtors have revised the proposed form of final order (the “Revised Final Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Final Order compared against the proposed final order attached to the Motion is attached hereto as **Exhibit B**. The U.S. Trustee, the Committee and the SEC have no objection to the entry of the Revised Final Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Final Order shall be uploaded to CM/ECF.

5. Accordingly, the Debtors respectfully request that the Court enter the Revised Final Order at its earliest convenience.

Dated: January 8, 2023
Wilmington, Delaware

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